



**THE CITY OF NEW YORK
LAW DEPARTMENT**

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September 13, 2024

Hon. Jennifer L. Rochon
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street, New York, NY 10007

Re: *McConnell Dorce v. City of New York, et al.*, 1:19-cv-02216 (JLR)(SLC)

Dear Judge Rochon:

We represent Defendants the City of New York, Louise Carroll, [former] Commissioner of the New York City Department of Housing Preservation and Development, and Sherif Soliman, [former] Commissioner of the New York City Department of Finance (together “Municipal Defendants” or “MDs”) in this litigation.

We are writing to request an extension of time to file Federal Rule 72 Objections to the order of Magistrate Judge Cave on September 3, 2024 compelling the deposition of former Mayor Bill de Blasio. The 14-day time period to file such Objections expires on Tuesday, September 17, 2024. This is our first request for an extension of time.

We are requesting a 7-day extension of time on the ground that we have been handicapped by the unavailability until today of the transcript of the September 3, 2024 conference. While it was a 7 day requirement for service of the transcript, it only arrived today. There is no written decision reflecting Magistrate Judge Cave’s order; she set forth her reasoning on the record during the September 3, 2024 Court conference.

Counsel for Defendants Neighborhood Restore Housing Development Fund and BSDC Kings Covenant Housing Development Fund Co. have consented to the extension of time.

Plaintiffs’ counsel did not consent to the 7-day extension, stating that they do not believe that the transcript is material to preparing an objection to Magistrate Judge Cave’s September 3

Order, notwithstanding that the transcript reflects Magistrate Judge Cave's stated reasoning for compelling the deposition of former Mayor Bill de Blasio. Plaintiffs' counsel did advise that they would be willing to entertain a one or two day extension as a matter of courtesy.

We believe that the precise reasoning that Magistrate Judge Cave used in making her decision needs to be addressed in the objections, and therefore it is vital to scrutinize that reasoning and address it in the objections. Further, we believe that no substantial prejudice to Plaintiffs would result from the grant of the requested extension.


Thank you for your consideration.

The Court extends the deadline to file Federal Rule 72 Objections to Magistrate Judge Cave's September 3, 2024 Order, Dkt. 371, until September 20, 2024.

Respectfully,

Dated: September 16, 2024
New York, New York

SO ORDERED.


JENNIFER L. ROCHON
United States District Judge

s/Margaret DeVoe

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Cc: All counsel